

EXHIBIT 2

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IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA

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THE CITY OF HUNTINGTON,
Plaintiff,

vs.

CIVIL ACTION
NO. 3:17-01362

AMERISOURCEBERGEN DRUG
CORPORATION, et al.,

Defendants.

CABELL COUNTY COMMISSION,

Plaintiff,

vs.

CIVIL ACTION
NO. 3:17-01665

AMERISOURCEBERGEN DRUG
CORPORATION, et al.,

Defendants.

* * * * *

Videotaped and videoconference deposition of
JAMES GELDHOF taken by the Defendants under the Federal
Rules of Civil Procedure in the above-entitled action,
pursuant to notice, before Teresa L. Harvey, a West
Virginia notary public and Registered Diplomat
Reporter, the witness appearing via videoconference from
Detroit, Michigan, West Virginia, on the 22nd day of
September, 2020.

1 A. To the best of my knowledge, yes.

2 Q. Did you find those documents yourself from some
3 larger dataset or were those documents that were given
4 to you by the -- by the plaintiff lawyers?

5 A. I requested the documents and they provided
6 them to me.

7 Q. What specifically was your request in terms of
8 documents that you wanted?

9 A. When they asked me to prepare this witness
10 report, the purpose of it was to assist the court in
11 giving an inside look or basically DEA's role within the
12 closed system of distribution. Knowing that, I wanted
13 to look at certain documents I thought would impact my
14 ability to make that -- you know, that -- that report.

15 Q. And what were those categories of documents you
16 wanted to look at that would impact that report?

17 A. I wanted to look at the actions taken by DEA.
18 I wanted to take a look at the Congressional inquiry
19 into West Virginia. I wanted to look at correspondence
20 between DEA and HDMA in guiding -- in policy guidance.
21 I'm trying to think of anything else off the top of my
22 head. There were other -- I wanted to look at the --
23 the suspicious -- the -- I'm sorry, the meetings that
24 Rannazzisi had, the distributor initiative meetings. I
25

1 1 wanted to look at Rannazzisi's letter. I wanted to look
2 2 at the letters that DEA sent -- the letters where he
3 3 sent back to, I think it was Mr. Walker, a culmination
4 4 of the meetings. I'd have to go through the report and
5 5 look at others. Those are off the top of my head.

6 6 Q. Why was it important to you to look at actions
7 7 taken by the DEA?

8 8 A. Because I think it summarizes our response to
9 9 the opioid epidemic as it pertains to the distributor
10 10 initiative.

11 11 Q. And why was it important for you to look at
12 12 meetings that Mr. Rannazzisi had with distributors?

13 13 A. Because I think it set the table for him
14 14 putting them on notice of what the expectations were of
15 15 them.

16 16 Q. When did those meetings occur where he put the
17 17 distributors on notice as to what was expected of them?

18 18 A. I think the first distributor initiative
19 19 meeting was fall of 2005, maybe the end of August,
20 20 September 2005.

21 21 Q. Are you aware of any equivalent meetings DEA
22 22 held with distributors before then where they put them
23 23 on notice of what was expected of them?

24 24 A. I believe the DEA headquarters did have
25

1 1 Cardinal before the fall of 2005 to put them on notice
2 2 of what was required of them?

3 3 A. I wouldn't know. That's, again, a headquarters
4 4 situation.

5 5 Q. A moment ago when you were talking about the
6 6 DEA you referred to the DEA as -- as "we," and what we
7 7 did. You're not here to speak for the DEA; correct?

8 8 A. I am not.

9 9 Q. You -- did you obtain any kind of clearance to
10 10 testify from DEA?

11 11 A. There was a -- not -- not in this matter, no.

12 12 Q. Are you familiar with a regulation that's
13 13 referred to as the Touhy regulation?

14 14 A. I am.

15 15 Q. Did you submit your report or your proposed
16 16 testimony to DEA to obtain Touhy approval under that
17 17 regulation?

18 18 A. I did not.

19 19 Q. Do you intend to comply with that regulation as
20 20 you understand it?

21 21 A. Absolutely.

22 22 Q. Okay. And so what -- what is it you understand
23 23 that Touhy permits or doesn't permit you to testify
24 24 about?

25

1 1 A. It does not permit me to -- to testify about
2 2 anything that would not be public information.

3 3 Q. So if I were to ask you details of
4 4 investigatory work you did at the DEA, would you answer
5 5 those questions?

6 6 A. No.

7 7 Q. You mentioned in your report some
8 8 investigations that you were involved in, including
9 9 regarding McKesson. If I ask you for details about the
10 10 McKesson investigation, would you answer those
11 11 questions?

12 12 A. No, only what's public information.

13 13 Q. Other than the fact of -- of the McKesson
14 14 settlements, is there anything you would tell me about
15 15 the McKesson investigations?

16 16 A. Off the top of my head -- I'd have to hear a
17 17 question, but off the top of my head, probably not.

18 18 Q. Okay. For example, if I were to ask you
19 19 questions -- and this goes for any investigation, but
20 20 I'll focus in on McKesson. If I were to ask you
21 21 questions as to information you learned that might not
22 22 be reflected in the settlement agreement, would you
23 23 share that with me?

24 24 A. No.

25

1 1 Q. If I were to ask you questions about whether
2 2 there were differences of opinion within the DEA or with
3 3 counsel working with the DEA over the course of action
4 4 or the strength of the evidence, would you answer those
5 5 questions?

6 6 A. No.

7 7 Q. If I were to ask you whether there were
8 8 recognized weaknesses in the case within the DEA or with
9 9 DEA's counsel, would you answer those questions?

10 10 A. No.

11 11 Q. If I were to ask you if there were dissenting
12 12 voices who said this is the wrong course of action,
13 13 we're actually going to harm public health by pursuing
14 14 this action, would you answer those questions?

15 15 A. No.

16 16 Q. Okay. And I just had to give you some specific
17 17 ones just to make sure I covered the waterfront. There
18 18 is nothing you can identify for me in terms of details
19 19 of your investigation of McKesson or other distributors
20 20 or other pharmacies or doctors that you would share with
21 21 me provided it's not public; correct?

22 22 A. Correct.

23 23 Q. Let's go back to the documents you looked for.
24 24 Did -- did you conduct any independent search of
25

1 1 documents that have been produced in this case by ABDC,
2 2 Cardinal or McKesson?

3 3 A. Search? I would say no.

4 4 Q. Did you conduct any search of the documents
5 5 that have been produced by Huntington or Cabell County?

6 6 A. No.

7 7 Q. Did you conduct any -- any media search or
8 8 literature search or news search by yourself?

9 9 A. No, not really. I checked -- you know, just
10 10 general searches regarding the companies and any
11 11 dealings they might have had with DEA that I didn't know
12 12 about but that was it and I didn't -- I didn't really
13 13 see anything.

14 14 Q. Did you review any documents that were not
15 15 provided to you by the attorneys in preparing your
16 16 report?

17 17 A. I don't believe so.

18 18 Q. Do you know how much of a proportion or
19 19 fraction of the total documents that have been provided
20 20 in this case you actually reviewed?

21 21 A. No.

22 22 Q. Do you take any issue with it being a tiny
23 23 fraction?

24 24 A. I wouldn't know whether to take issue with it
25

1 1 or not. I don't know.

2 2 Q. Okay. Do you have your report in front of you?

3 3 A. I do.

4 4 Q. Exhibit 1, did you write this or was it written
5 5 for you?

6 6 A. I wrote it.

7 7 Q. Are you ready to testify fully regarding the
8 8 opinions in the report?

9 9 A. I am.

10 10 Q. Is there any further work you know of that you
11 11 need to do to be able to testify?

12 12 A. No.

13 13 Q. Does it contain all the opinions you intend to
14 14 offer in this case?

15 15 A. Yes.

16 16 Q. All right. So let's just go through it quickly
17 17 at a high level. On Page 1 you give your experience and
18 18 training. And then from Pages 2 through 3 you talk
19 19 about the laws and regulations.

20 20 A. Yes.

21 21 Q. Or some of the laws and regulations that apply
22 22 relating to the DEA and controlled substances; correct?

23 23 A. Yes. Yes.

24 24 Q. And you're not here testifying as a lawyer on
25

1 1 enforcement actions.

2 2 Q. Oh, got it. Got it. Are there any opinions
3 3 that you give in your report that you intend to testify
4 4 about regarding the specific conduct of any defendant in
5 5 this case?

6 6 A. No.

7 7 Q. And, for example, you don't talk about any
8 8 defendants' Suspicious Order Monitoring Systems;
9 9 correct?

10 10 A. No.

11 11 Q. I don't believe you reviewed those in preparing
12 12 your opinion; correct?

13 13 A. Correct.

14 14 Q. Do you -- if I were to ask you for Cardinal or
15 15 ABDC or McKesson, what are the names of their programs
16 16 at different points in time, would you be able to answer
17 17 that?

18 18 A. No.

19 19 Q. You didn't review, as I understand it, any
20 20 communications between ABDC, Cardinal and McKesson on
21 21 the one hand or, one of them individually, and the DEA
22 22 about their Suspicious Order Monitoring Programs, did
23 23 you?

24 24 A. I did.

25

1 1 distributor into West Virginia?

2 2 A. Yes.

3 3 Q. Were they a meaningful distributor into Cabell
4 4 County and Huntington?

5 5 A. I don't -- I can't remember the counties. I
6 6 can only tell you in the state.

7 7 Q. Do you know if McKesson, Cardinal and ABDC
8 8 specifically distributed into Cabell County and
9 9 Huntington?

10 10 A. I don't.

11 11 Q. Do you know if Miami-Luken and McKesson,
12 12 Cardinal, ABDC are all defendants in this case?

13 13 A. Miami-Luken isn't.

14 14 Q. And do you know why they're not?

15 15 A. I believe they're out of business.

16 16 Q. Do you -- do you have any opinions against
17 17 Miami-Luken?

18 18 A. Yes.

19 19 Q. And what are your opinions with respect to
20 20 Miami-Luken?

21 21 A. My personal opinions?

22 22 Q. Sure.

23 23 A. I think they were a pretty bad company and they
24 24 sold a lot of pills for illicit purposes into West
25

1 1 Virginia, as did others.

2 2 Q. Why were they -- sorry I cut you off.

3 3 A. Okay. As did others.

4 4 Q. Why -- why were they a pretty bad company?

5 5 A. Their volume of sales was pretty extreme. It
6 6 was sales of abuse of hydrocodone, oxycodone, rural
7 7 counties. I think the -- the addiction rate in West
8 8 Virginia has been pretty well chronicled, and I think
9 9 it's -- I'm pretty familiar with Portsmouth, Ohio and
10 10 it's been basically the same area. And I think what
11 11 happened to people down in that area of the country
12 12 is -- is outrageous. I really do.

13 13 Q. Are you offering any specific opinions against
14 14 Miami-Luken in your report?

15 15 A. No.

16 16 Q. Are you offering any specific opinions against
17 17 McKesson in your report?

18 18 A. No. No.

19 19 Q. Same answer for ABDC and Cardinal, no specific
20 20 opinions against them in your report?

21 21 A. Correct.

22 22 Q. All right. And just to round out that line of
23 23 questions. You've not reviewed any testimony from
24 24 employees of ABDC, Cardinal, or McKesson taken in this
25

1 1 to review depositions, probably a couple years ago. I
2 2 reviewed certain depositions and then it ended probably
3 3 a year and a half ago. So I have read depositions of
4 4 people from ABC [sic], Cardinal, and -- and McKesson.

5 5 Q. My question is did you undertake a complete
6 6 review of all the depositions?

7 7 A. No.

8 8 Q. Did you undertake a complete review even of all
9 9 the depositions of people at those companies who were
10 10 responsible for meeting Controlled Substances Act
11 11 responsibilities?

12 12 A. I read the depositions of some of them. I
13 13 don't know what you mean by "review," but I have read
14 14 them.

15 15 Q. That's my question. Did you review all of
16 16 them?

17 17 A. Oh, no, I did not.

18 18 Q. Have you undertaken any review of whether
19 19 McKesson's, Cardinal's and ABDC's compliance with the
20 20 Controlled Substance -- Substances Act was better,
21 21 worse, the same as other distributors in West Virginia?

22 22 A. No. I was not asked to do that.

23 23 Q. Am I correct that you have not studied ABDC,
24 24 Cardinal or McKesson customers in Cabell County?

25

1 1 A. That's correct.

2 2 Q. You don't identify any problematic customers
3 3 that they had in Cabell County or Huntington; correct?

4 4 A. I don't.

5 5 Q. You don't know of an instance where they
6 6 shipped to a pharmacy or other dispensing entity in
7 7 Cabell County or Huntington that was not licensed by the
8 8 DEA and the State of West Virginia?

9 9 A. I -- I didn't review that, no.

10 10 Q. You don't know of instances where they shipped
11 11 and the pills they shipped were dispensed without valid
12 12 prescription; correct?

13 13 A. I have no knowledge of that.

14 14 Q. And have you -- you have not identified any
15 15 volume of pills they supplied in Cabell County or
16 16 Huntington that were -- that were diverted; correct?

17 17 A. Correct.

18 18 Q. In your report, you talk about -- and you've
19 19 already mentioned this today. You talk about a
20 20 Congressional hearing report from the Energy and
21 21 Commerce Committee?

22 22 A. Yes.

23 23 Q. Do you know what I'm -- what I'm referencing?

24 24 A. I do.

25

1 1 Q. And let's just go ahead, I'm going to show you
2 2 a demonstrative. I'll just put it up on the screen.
3 3 It's just going to be some names.

4 4 A. Okay.

5 5 MR. SCHMIDT: If you could put up the
6 6 demonstrative with the pharmacies.

7 7 Q. Do you see these names here? And I'll just
8 8 read them into the record: Sav-Right No. 1, Family
9 9 Discount, Tug Valley, West Side, Hurley Drug Company,
10 10 Beckley. Do you recognize those -- those pharmacy
11 11 names?

12 12 A. I do.

13 13 Q. Do you know that those are the pharmacies
14 14 mentioned specifically in the Energy and Commerce
15 15 Report?

16 16 A. I can't remember if they're specific in that,
17 17 but I know the names.

18 18 Q. Which one of those pharmacies, if any, are in
19 19 Huntington or Cabell County?

20 20 A. I don't know.

21 21 Q. Do you know if any of the pharmacies identified
22 22 in the Energy and Commerce Report are in Huntington or
23 23 Cabell County?

24 24 A. I do not.

25

1 1 A. No.

2 2 Q. Did you review diligence files for pharmacies
3 3 in Cabell County or Huntington?

4 4 A. No.

5 5 Q. Did you review thresholds change request
6 6 documentation for Cabell County and Huntington?

7 7 A. No.

8 8 Q. Did you review the diligence undertaken as to
9 9 existing customers by ABDC, McKesson, or Cardinal in
10 10 Cabell County or Huntington?

11 11 A. No.

12 12 COURT REPORTER: Hold on one second,
13 13 please, so I can mute my mic, if I can find it.

14 14 I'm sorry, go ahead.

15 15 Q. So am I correct that you've got no opinions as
16 16 to the due diligence conducted by McKesson, Cardinal or
17 17 ABDC for Huntington or Cabell County pharmacies?

18 18 A. Correct.

19 19 Q. Am I correct that you did not review any
20 20 records of shipments blocked by the distributors to
21 21 pharmacies in Cabell County or Huntington?

22 22 A. I did not.

23 23 Q. Do you have any opinions about doctors --
24 24 specific doctors or other prescribers in Cabell County
25

1 1 or Huntington?

2 2 A. No, I do not.

3 3 Q. Have you undertaken any review of prescribing
4 4 practices or medical need in Cabell County or
5 5 Huntington?

6 6 A. No.

7 7 Q. You're not offering any view as to whether --
8 8 as to what the appropriate level of prescription opioids
9 9 for Cabell and Huntington are, are you?

10 10 A. I am not.

11 11 Q. You're not offering any views on whether any
12 12 specific level of appropriate prescription opioid
13 13 shipments were exceeded in Cabell County or Huntington;
14 14 correct?

15 15 A. I'm not.

16 16 Q. You're not offering an opinion on whether there
17 17 was actual diversion of pills sent by McKesson or
18 18 Cardinal or ABDC to Huntington or Cabell County;
19 19 correct?

20 20 A. I am not.

21 21 Q. You're not offering any opinion on whether
22 22 pills sent by McKesson, Cardinal or ABDC to Huntington
23 23 or Cabell County actually caused harm in those
24 24 jurisdictions; correct?

25

1 1 A. Correct.

2 2 Q. Your -- your report does not discuss any West
3 3 Virginia state legal obligations; correct?

4 4 A. Correct.

5 5 Q. And I take it you've not studied those
6 6 obligations or how defendants met them?

7 7 A. I have not.

8 8 Q. I think I covered this. You didn't review any
9 9 specific suspicious orders made for Huntington or Cabell
10 10 County by defendants or anyone else?

11 11 A. I did not.

12 12 Q. Do you know which distributor was the largest
13 13 distributor at any point in time into Cabell County or
14 14 Huntington?

15 15 A. I do not.

16 16 Q. Do you know if it was one of the three: ABDC,
17 17 Cardinal or McKesson?

18 18 A. I do not.

19 19 Q. You reviewed -- if you -- if you go back to
20 20 your report, Exhibit 1.

21 21 A. Uh-huh.

22 22 Q. Right at the very end of the materials
23 23 considered, there's a list of DEA testimony, on Page 5.
24 24 Tell me when you -- when you have that there.

25

1 1 Q. Am I correct that you've not reviewed testimony
2 2 from Mr. Strait, Ms. Harper-Avilla, Ms. Howard, and
3 3 Mr. Martin?

4 4 A. That's correct.

5 5 Q. And is there a reason you didn't review their
6 6 depositions?

7 7 A. I probably didn't even know about them.

8 8 Q. Am I correct that you've not reviewed documents
9 9 generated by Cabell County or Huntington regarding
10 10 prescription opioids?

11 11 A. Correct.

12 12 Q. And there's no analysis you've conducted as to
13 13 harm from the opioid crisis, specifically in Cabell
14 14 County or Huntington; is that correct?

15 15 A. Correct.

16 16 Q. There's no opinion you're giving regarding harm
17 17 caused by McKesson, ABDC, or Cardinal in Cabell County
18 18 or Huntington?

19 19 A. That's correct.

20 20 Q. Was -- was it important for you, in the
21 21 categories of documents that you did look at, for you to
22 22 review the complete set of documents in that given
23 23 category?

24 24 A. I don't -- I'm sorry, I don't understand the
25

1 1 question. Could you --

2 2 Q. Yeah, of course. There -- there were certain
3 3 categories of documents you looked at, and you mentioned
4 4 some of them earlier. For example, you mentioned the
5 5 meetings that Mr. Rannazzisi had with the distributors.

6 6 Do you remember referencing that?

7 7 A. Yes.

8 8 Q. When you were looking at a -- at a topic like
9 9 that, was it important for you to review all the
10 10 documents you could find regarding that topic?

11 11 A. I tried to, yes.

12 12 Q. For example, are you aware that there are
13 13 meeting minutes of some of those meetings that were held
14 14 during the Distributor Initiatives with the distributors
15 15 in this case that do not appear on your list of
16 16 documents reviewed?

17 17 A. No, I'm not.

18 18 Q. Have you reviewed such meeting minutes
19 19 reflecting the meetings between DEA and the distributors
20 20 in this case as part of a Distributor Initiative?

21 21 A. I have not.

22 22 Q. You list on your list -- and I can point you to
23 23 where it is, if you want, but you list on your list some
24 24 communications that Congress had with the companies in
25

1 1 (Brief recess.)

2 2 VIDEOGRAPHER: The time is 10:15 a.m. We
3 3 are on the record.

4 4 MR. SCHMIDT: I don't have Mister --
5 5 Mr. Geldhof on the screen. Is that just a problem on my
6 6 end?

7 7 Oh, now I do.

8 8 BY MR. SCHMIDT:

9 9 Q. Mr. Geldhof, are you ready to proceed?

10 10 A. I am.

11 11 Q. Okay. Just -- just to clarify something you
12 12 referenced a couple times. You're here as an expert
13 13 witness; correct?

14 14 A. Correct.

15 15 Q. You're not here as a fact witness regarding
16 16 your work at DEA; correct?

17 17 A. Correct.

18 18 Q. And the reason I ask that is because you've --
19 19 you've mentioned personal opinions a few times, and I've
20 20 not delved into some of those personal opinions in
21 21 detail.

22 22 You're not here to offer your personal
23 23 opinions; correct?

24 24 A. Absolutely not. Only if I'm asked.

25

1 1 Q. Okay. And I take it your personal opinions are
2 2 based on the specific work you did at the DEA; correct?

3 3 A. Correct.

4 4 Q. Including work that, if I were to ask you to
5 5 detail us about, you would say, "I can't talk about that
6 6 because of that Touhy issue we were discussing."
7 7 Correct?

8 8 A. Correct.

9 9 Q. Okay. Have you ever been to Huntington or
10 10 Cabell County?

11 11 A. I don't believe so.

12 12 Q. When you discuss in your report various
13 13 settlement documents, do you -- do you understand that
14 14 those settlements focus on specific distribution centers
15 15 and specific pharmacies?

16 16 A. Yes.

17 17 Q. Do you know that none of those -- do you know
18 18 whether any of those distribution centers supplied
19 19 Cabell County or Huntington?

20 20 A. I would like to just amend my -- my last
21 21 statement. While -- and I -- I don't know for sure that
22 22 this was the fact, but, a lot of times, while the
23 23 specific administrative or civil action may cover one or
24 24 two distributorships, generally speaking, the MoUs cover
25

1 1 Q. Are there any pharmacies in West Virginia you
2 2 can point me to where DEA specifically acted on those
3 3 suspicious orders with respect to the pharmacy in terms
4 4 of investigation or in terms of reregistration of that
5 5 pharmacy?

6 6 A. No.

7 7 Q. Are you aware that DEA has access to ARCOS
8 8 data?

9 9 A. Yes.

10 10 Q. And does that ARCOS data include data on
11 11 pharmacy dispensing?

12 12 A. It includes data on pharmacy purchases.

13 13 Q. Does DEA have access to individual
14 14 doctor-prescribing information?

15 15 A. I'll qualify that. Yes, through the different
16 16 state programs, but there's different criteria to use
17 17 those programs. I don't -- a lot of states do not share
18 18 the information as much as they should and I -- you
19 19 know, but technically, yes.

20 20 Q. Do you have any knowledge of any limitations in
21 21 access to prescriber data in West Virginia that DEA
22 22 suffered from?

23 23 A. I have no idea.

24 24 Q. Do you know of any actions in registering or, I
25

1 1 guess, in reregistering doctors that DEA -- strike that.

2 2 Do you know if DEA ever looked at ARCOS
3 3 data in reregistering pharmacies?

4 4 A. I have no idea.

5 5 Q. Do you know if DEA ever evaluated prescribing
6 6 data in reregistering doctors or deciding whether to
7 7 investigate doctors?

8 8 A. You know, West Virginia was not my field
9 9 division. I can't speak to that.

10 10 Q. What about nationwide? Do you know if
11 11 nationwide the DEA ever routinely looked at prescriber
12 12 data in reregistering doctors or deciding whether
13 13 they're going to investigate them?

14 14 A. You mean -- are you talking about state --
15 15 state data?

16 16 Q. Yeah.

17 17 A. I can only speak about Detroit. I can't speak
18 18 about other offices.

19 19 Q. Okay. In Detroit, did DEA regularly consult
20 20 with state prescribing data before reregistering
21 21 doctors?

22 22 A. I wouldn't say regularly, but it was done.

23 23 Q. And do you know if it ever led to any
24 24 individual doctor not being reregistered?

25

1 1 A. That's correct.

2 2 Q. And are you aware of whether there's any single
3 3 entity or person you could point me to and say, if that
4 4 company wouldn't have done what they did, or that
5 5 individual wouldn't have done what they did, standing
6 6 alone, the opioid crisis would have been meaningfully
7 7 different in Cabell County or Huntington?

8 8 A. No.

9 9 MS. QUEZON: Object to the form.

10 10 THE WITNESS: No information.

11 11 Q. Okay. And that includes the distributors in
12 12 this case; correct?

13 13 MS. QUEZON: Object to the form.

14 14 THE WITNESS: I have no information about
15 15 how much a distributor is sending to all of West
16 16 Virginia.

17 17 Q. Okay. You've -- you've given no opinion on
18 18 what it will take to remediate the opioid crisis in
19 19 Cabell County; right?

20 20 A. Yes.

21 21 Q. Do you know how much of remediation efforts
22 22 should be focused on prescription versus illegal drugs?

23 23 MS. QUEZON: Object to the form.

24 24 THE WITNESS: No idea.

25

1 1 don't know if counsel knows right now what the actual
2 2 specific hours are.

3 3 MS. QUEZON: I don't.

4 4 MR. SCHMIDT: We will request
5 5 confirmation of that.

6 6 MS. QUEZON: Okay.

7 7 MR. SCHMIDT: Let me just look at my
8 8 notes for a minute, Mr. Geldhof.

9 9 VIDEOGRAPHER: Are we going off the
10 10 record?

11 11 MR. SCHMIDT: No, let's stay on the
12 12 record.

13 13 BY MR. SCHMIDT:

14 14 Q. Are there any opinions you were asked to give
15 15 in this case that you couldn't give for any reason?

16 16 A. No.

17 17 Q. Are there any opinions that you were given in
18 18 this case that the lawyers did not ask you to give?

19 19 A. No.

20 20 Q. Are there any other experts in this case from
21 21 the plaintiffs or the defendants that you've spoken to
22 22 in connection with your work on this case?

23 23 A. Not about the report or not about the
24 24 deposition.

25